

PUBLIC NOTICE
FOR COMMENT ON A DRAFT STATE OPERATING PERMIT FOR THE MIRANT
POTOMAC RIVER LLC's POTOMAC RIVER GENERATING STATION
RECOMMENDED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY

Public Notice Date: October 19, 2007

The Northern Regional Office of the Department of Environmental Quality requests public comment on a draft State Operating Permit for the Mirant Potomac River LLC's, Potomac River Generating Station as recommended to the State Air Pollution Control Board on October 10, 2007.

Source Name:	Potomac River Generating Station
Registration No.:	70228
Mailing Address and Location:	1400 N. Royal Street Alexandria, Virginia

The draft State Operating permit will impose requirements upon the operation of the facility. Included in the operating requirements are:

1. the use of low NO_x burners on units C1, C2, C3, C4 and C5 and Selective Over Fire Air (SOFA) on units C3, C4 and C5 for the control of Oxides of Nitrogen;
2. the use of a sodium sesquicarbonate or a Department of Environmental Quality approved alternative and low sulfur coal to control emission of sulfur dioxide, hydrogen chloride (HCl) and hydrogen fluoride (HF);
3. the use of a fabric filter baghouse on the outlets of the two bottom ash and the one fly ash silos. Additionally, the fabric filter baghouse for the two bottom ash silos are to be vented to the inlet side of unit C1's hot side electrostatic precipitator.
4. particulate emissions from units C1, C2, C3, C4 and C5 are to be controlled by the use of both hot side and cold side electrostatic precipitators.

The facility will be required to install and operate Continuous Emission Monitors (CEM) for NO_x, SO₂, and Carbon Monoxide in accordance with the Environmental Protection Agency's requirements contained in 40 Code of Federal Regulations', Part 60, Appendix B. In addition to the requirements for CEM's, the facility will be required to test the stack effluent for CO, PM, PM₁₀, PM_{2.5}, HCl and HF. The proposed permit places the following short term emission limits on the facility:

Operating Scenario	SO₂ 3 hr block avg lbs/MMBtu per unit	SO₂ 3 hr block avg lbs/Hr	SO₂ 24 hr block avg lbs/MMBtu	SO₂ 24 hr block avg lbs/Day
2 cycling	0.50	1,041.00	0.48	23,984.64
2 base	0.37	811.78	0.28	14,743.68
1 cycling/1 base	0.42	907.20	0.36	18,662.40
2 cycling/ 1 base	0.29	924.81	0.27	20,664.72
1 cycling/ 2 base	0.27	876.69	0.23	17,923.44
3 base	0.25	803.00	0.21	16,188.48

Operating Scenario	PM 1 hr avg Lb/MM Btu	PM 1 hr avg Lb/Hr	PM 24 hr block avg Lb/MM Btu	PM 24 hr block avg Lb/Day
Max value for any case	0.055	178.59	0.055	4,286.04

Operating Scenario	PM ₁₀ 1 hr avg Lb/MM Btu	PM ₁₀ 1 hr average Lb/Hr	PM ₁₀ 24 hr block avg Lb/MM Btu	PM ₁₀ 24 hr block avg Lb/Day
Max value for any case	0.055	178.59	0.055	4,286.04

Operating Scenario	PM _{2.5} 1 hr average Lb/MM Btu	PM _{2.5} 1 hr avg Lb/Hr	PM _{2.5} 24 hr block avg Lb/MM Btu	PM _{2.5} 24 hr block avg Lb/Day
Max value for any case	0.055	178.59	0.055	4,286.04

Operating Scenario	NOx 1 hr avg Lb/MM Btu (30- day rolling avg.)	NOx 1 hr avg Lb/Hr (30 day rolling avg)	NOx 24 hr average Lb/MM Btu	NOx 24 hr average Lb/Day
Max value for any case	0.32	1,039.04		

Operating Scenario	CO 1 hr avg Lb/MM Btu	CO 1 hr avg Lb/Hr	CO 24 hr block avg Lb/MM Btu	CO 24 hr block avg Lb/Day
Max value for any case		2,997.20		

Operating Scenario	HCl 1 hr avg Lb/MM Btu	HCl 1 hr avg Lb/Hr	HCl 24 hr average Lb/MM Btu	HCl 24 hr avg Lb/Day
Max value for any case	0.021	68.19		

Operating Scenario	HF 1 hr avg Lb/MM Btu	HF 1 hr avg Lb/Hr	HF 24 hr avg Lb/MM Btu	HF 24 hr avg Lb/Day
Max value for any case	0.0076	24.68		

As well as the following annual emission limits:

	Tons/Year
Particulate Matter (PM) including condensable PM	562
PM-10 including condensable PM-10	377
PM-2.5 including condensable PM-2.5	163
Sulfur Dioxides (SO ₂)	3813
Oxides of Nitrogen (as NO ₂)	3700
Oxides of Nitrogen (as NO ₂) (Ozone Season until 12/31/08)	1600
Carbon Monoxide (CO)	215
Volatile Organic Compounds (VOC)	26
Hydrogen Chloride (HCl)	100
Hydrogen Fluoride (HF)	36.22

Included in the permit are requirements for the facility to perform annual testing for PM₁₀, PM_{2.5}, HCl and HF and Hg and quarterly reports for the continuous monitoring systems and semi-annual reporting of emissions and monitoring systems utilization and availability.

The State Air Pollution Control Board is also requesting comments on the following issues:

1. Should Continuous Emission Monitoring Systems be required for all Particulate Matter regulated by the Regulations for the Control and Abatement of Air Pollution and (1) does the Environmental Protection Agency (EPA) have an approved methodology for these systems, and (2) has the EPA certified an in-stack instrument for this purpose?
2. Should the operating performance of the control equipment for sulfur dioxide (SO₂) be the basis for permit limitations rather than the array of operating scenarios?
3. Are the varying SO₂ control rates considered intermittent controls?
4. Should permit emission rates for SO₂ be established to ensure the use of Trona (or other sorbent materials), and should the proposed minimum sulfur content requirement be eliminated?
5. Should the Clean Air Interstate Rule and Clean Air Mercury Rule requirements be included in the permit?
6. What changes should be made to the architecture of the permit and the emission limits in the proposed permit?
7. What changes or additions should be made to the proposed parametric monitoring and (1) does such monitoring obviate the need for Particulate Matter Continuous Emissions Monitoring Systems and (2) what is the commercial availability of these instruments?

Both the draft State Operating Permit and the Statement of Basis may be accessed under the "What's New" section of the DEQ web page <https://www.deq.virginia.gov>

The Northern Regional Office of the Department of Environmental Quality will accept written comments on the state operating permit for 30 days following the appearance of this notice in the newspaper. The written comment period for the State Operating Permit will end at the close of the public hearing on November 19, 2007. Only those comments received within the time period will be considered. The Northern Regional Office of the Department of Environmental Quality will hold a public briefing at 6:30 PM to briefly review the contents of the proposed State Operating Permit and answer questions. The public briefing will be followed by a public hearing beginning at 7:00 PM on November 19, 2007. The public briefing and public hearing will be at the NANNIE J. LEE RECREATION CENTER located at 1108 Jefferson Street Alexandria, VA 22314. Please direct all inquiries concerning the draft State Operating Permit recommended by the Northern Regional Office of the Department of Environmental Quality to Mr. Terry Darton at (703) 583-3845. All comments and requests for information on the draft State Operating Permit and the stated above issues should be sent to Mr. Terry Darton, Air Permit Manager, 13901 Crown Court, Woodbridge VA, 22193 or they may be emailed to thdarton@deq.virginia.gov on any business day between the hours of 8:30 a.m. and 5:00 PM.

Regional Director